

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

FABIAN R. STRAUSS

: CIVIL ACTION

VERSUS

: NUMBER: 17-235

: JUDGE REBECCA F. DOHERTY

**BD. OF SUPERVISORS FOR THE UNIVERSITY
OF LOUISIANA SYSTEM, ET AL**

**: MAGISTRATE JUDGE
CAROL B. WHITEHURST**

RESPONSES TO REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1:

Admit that you did not live in housing provided by the University of Louisiana-Lafayette after 2/5/2016.

RESPONSE TO REQUEST FOR ADMISSION NO. 1:

Objection as to relevance as housing related claims have been dismissed.

REQUEST FOR ADMISSION NO. 2:

Admit that if you lived in housing provided by the University of Louisiana-Lafayette after 2/5/2016, it was equipped with a fire alarm that had a strobe light attached, along with a bed-shaking device.

RESPONSE TO REQUEST FOR ADMISSION NO. 2:

Objection as to relevance as housing related claims have been dismissed.

REQUEST FOR ADMISSION NO. 3:

Admit that you have been permitted access to instructors' notes for your classes at the University of Louisiana-Lafayette.

RESPONSE TO REQUEST FOR ADMISSION NO. 3:

Denied. Instructor's notes only began in the summer term of 2015.

REQUEST FOR ADMISSION NO. 3:

Admit that you have been assigned a note taker for your classes at the University of Louisiana-Lafayette, in which you requested a note taker.

RESPONSE TO REQUEST FOR ADMISSION NO. 4:

Admitted.

REQUEST FOR ADMISSION NO. 4:

Admit that you were offered preferential front row seating in all your classes at the University of Louisiana-Lafayette.

RESPONSE TO REQUEST FOR ADMISSION NO. 4:

Admitted.

REQUEST FOR ADMISSION NO. 5:

Admit that you have been assigned a professional captionist for your classes at the University of Louisiana-Lafayette.

RESPONSE TO REQUEST FOR ADMISSION NO. 5:

Denied. This accommodation only began in October 2014. Plaintiff further objects to this request as ambiguous in the use of the term "professional."

REQUEST FOR ADMISSION NO. 6:

Admit that the Office of Disability Services at the University of Louisiana-Lafayette responded to any concerns you have had regarding your academic accommodations.

RESPONSE TO REQUEST FOR ADMISSION NO. 6:

Denied. Plaintiff objects to the ambiguity of the phrase “responded to any concerns.” This request may be calling for a legal conclusion.

REQUEST FOR ADMISSION NO. 7:

Admit that the University of Louisiana-Lafayette or any employee of the University of Louisiana-Lafayette did not maliciously fail to provide you with academic accommodations for your classes at the University of Louisiana-Lafayette.

RESPONSE TO REQUEST FOR ADMISSION NO. 7:

Denied. Plaintiff objects to this request as it calls for speculation.

REQUEST FOR ADMISSION NO. 8:

Admit that you received notes taken by note takers in all your classes at the University of Louisiana-Lafayette that you have asked for such accommodation.

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

Denied. Plaintiff did not receive all notes from all note takers, and many times notes were provided late or untimely.

REQUEST FOR ADMISSION NO. 9:

Admit that your instructors wore a Surf Link device in your classes at the University of Louisiana-Lafayette that fed directly into your hearing aids.

RESPONSE TO REQUEST FOR ADMISSION NO. 9:

Admitted in part. Plaintiff does not recall if all professors wore the Surf Link device.

REQUEST FOR ADMISSION NO. 10:

Admit that the University of Louisiana-Lafayette provided you with access to a microphone beginning in the Fall 2014 semester as an academic accommodation.

RESPONSE TO REQUEST FOR ADMISSION NO. 10:

Denied.

REQUEST FOR ADMISSION NO. 11:

Admit that the University of Louisiana-Lafayette provided you with access to a digital recorder beginning in the Spring 2015 semester as an academic accommodation.

RESPONSE TO REQUEST FOR ADMISSION NO. 11:

Denied.

REQUEST FOR ADMISSION NO. 12:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of extended testing time for the Fall 2013 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 12:

Admitted.

REQUEST FOR ADMISSION NO. 13:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of note-takers for the Fall 2013 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 13:

Admitted.

REQUEST FOR ADMISSION NO. 14:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of front row seating for the Fall 2013 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 14:

Admitted.

REQUEST FOR ADMISSION NO. 15:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors face the class when speaking and avoid hand gestures that obstruct the face for the Fall 2013 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 15:

Admitted in part. This accommodation was requested in over the course of the Spring 2015 semester, but professors were not necessarily compliant.

REQUEST FOR ADMISSION NO. 16:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of the use of a tape recorder to access lectures for the Fall 2013 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 16:

Admitted.

REQUEST FOR ADMISSION NO. 17:

Admit that you only requested the academic accommodations of extra time, note-takers, and preferential seating for the Fall 2013 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 17:

Denied. Plaintiff only requested professional note-takers for the Fall 2013 semester.

REQUEST FOR ADMISSION NO. 18:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of extended testing time for the Spring 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 18:

Admitted.

REQUEST FOR ADMISSION NO. 19:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of note-takers for the Spring 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 19:

Admitted.

REQUEST FOR ADMISSION NO. 20:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of front row seating for the Spring 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 20:

Admitted.

REQUEST FOR ADMISSION NO. 21:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors face the class when speaking and avoid hand gestures that obstruct the face for the Spring 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 21:

Admitted.

REQUEST FOR ADMISSION NO. 22:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of the use of a tape recorder to access lectures for the Spring 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 22:

Admitted.

REQUEST FOR ADMISSION NO. 23:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of extended testing time for the Summer 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 23:

Admitted.

REQUEST FOR ADMISSION NO. 24:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of note-takers for the Summer 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Admitted.

REQUEST FOR ADMISSION NO. 25:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of front row seating for the Summer 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 25:

Admitted.

REQUEST FOR ADMISSION NO. 26:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors face the class when speaking and avoid hand gestures that obstruct the face for the Summer 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 26:

Admitted.

REQUEST FOR ADMISSION NO. 27:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of the use of a tape recorder to access lectures for the Summer 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 27:

Admitted.

REQUEST FOR ADMISSION NO. 28:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of extended testing time for the Fall 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 28:

Admitted.

REQUEST FOR ADMISSION NO. 29:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of note-takers for the Fall 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 29:

Admitted.

REQUEST FOR ADMISSION NO. 30:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of front row seating for the Fall 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 30:

Admitted.

REQUEST FOR ADMISSION NO. 31:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors face the class when speaking and avoid hand gestures that obstruct the face for the Fall 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 31:

Admitted.

REQUEST FOR ADMISSION NO. 32:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of the use of a tape recorder to access lectures for the Fall 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 32:

Admitted.

REQUEST FOR ADMISSION NO. 33:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors wear a Surf Link device on their person that fed directly into your hearing aid for the Fall 2014 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 33:

Admitted.

REQUEST FOR ADMISSION NO. 34:

Admit that for the Fall 2014 semester the University of Louisiana-Lafayette provided you with the academic accommodation of remote captioning for your Biology 230 class.

RESPONSE TO REQUEST FOR ADMISSION NO. 34:

Admit in part. Accommodation not available until October 2014.

REQUEST FOR ADMISSION NO. 35:

Admit that for the Fall 2014 semester the University of Louisiana-Lafayette provided you with the academic accommodation of remote captioning for your Biology 231 class.

RESPONSE TO REQUEST FOR ADMISSION NO. 35:

Admit in part. Accommodation not available until October 2014.

REQUEST FOR ADMISSION NO. 36:

Admit that for the Fall 2014 semester the University of Louisiana-Lafayette provided you with the academic accommodation of remote captioning for your Chemistry 108 class.

RESPONSE TO REQUEST FOR ADMISSION NO. 36:

Admit in part. Accommodation not available until October 2014.

REQUEST FOR ADMISSION NO. 37:

Admit that for the Fall 2014 semester the University of Louisiana-Lafayette provided you with the academic accommodation of remote captioning for your Chemistry 115 class.

RESPONSE TO REQUEST FOR ADMISSION NO. 37:

Admit in part. Accommodation not available until October 2014.

REQUEST FOR ADMISSION NO. 38:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of extended testing time for the Spring 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 38:

Admitted.

REQUEST FOR ADMISSION NO. 39:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of note-takers for the Spring 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 39:

Admitted.

REQUEST FOR ADMISSION NO. 40:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of front row seating for the Spring 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 40:

Admitted.

REQUEST FOR ADMISSION NO. 41:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors face the class when speaking and avoid hand gestures that obstruct the face for the Spring 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 41:

Admitted.

REQUEST FOR ADMISSION NO. 42:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of the use of a tape recorder to access lectures for the Spring 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 42:

Admitted.

REQUEST FOR ADMISSION NO. 43:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors wear a Surf Link device on their person that fed directly into your hearing aid for the Spring 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 43:

Admitted.

REQUEST FOR ADMISSION NO. 44:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of remote captioning for the Spring 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 44:

Admitted.

REQUEST FOR ADMISSION NO. 45:

Admit that for the Spring 2015 semester the University of Louisiana-Lafayette provided you with the academic accommodation of remote captioning for your Biology 233 class.

RESPONSE TO REQUEST FOR ADMISSION NO. 45:

Admitted.

REQUEST FOR ADMISSION NO. 46:

Admit that for the Spring 2015 semester the University of Louisiana-Lafayette provided you with the academic accommodation of remote captioning for your Biology 234 class.

RESPONSE TO REQUEST FOR ADMISSION NO. 46:

Denied. Plaintiff was not enrolled in this class for the Spring 2015 semester.

REQUEST FOR ADMISSION NO. 47:

Admit that for the Spring 2015 semester the University of Louisiana-Lafayette provided you with the academic accommodation of remote captioning for your Chemistry 231 class.

RESPONSE TO REQUEST FOR ADMISSION NO. 47:

Admitted.

REQUEST FOR ADMISSION NO. 48:

Admit that for the Spring 2015 semester the University of Louisiana-Lafayette provided you with the academic accommodation of remote captioning for your Chemistry 233 class.

RESPONSE TO REQUEST FOR ADMISSION NO. 48:

Admitted.

REQUEST FOR ADMISSION NO. 49:

Admit that for the Spring 2015 semester the University of Louisiana-Lafayette provided you with the academic accommodation of remote captioning for your Math 110 class.

RESPONSE TO REQUEST FOR ADMISSION NO. 49:

Admitted.

REQUEST FOR ADMISSION NO. 50:

Admit that for the Spring 2015 semester the University of Louisiana-Lafayette provided you with remote captioning for your Sociology 100 class.

RESPONSE TO REQUEST FOR ADMISSION NO. 50:

Admitted.

REQUEST FOR ADMISSION NO. 51:

Admit that the University of Louisiana-Lafayette provided you with the academic accommodation of onsite captioning performed by Erin Duplechin during the Spring 2015 semester starting on February 9, 2015.

RESPONSE TO REQUEST FOR ADMISSION NO. 51:

Admitted.

REQUEST FOR ADMISSION NO. 52:

Admit that the University of Louisiana-Lafayette provided you with the academic accommodation of onsite captioning for all your classes for the Spring 2015 semester beginning March 17, 2015.

RESPONSE TO REQUEST FOR ADMISSION NO. 52:

Admitted.

REQUEST FOR ADMISSION NO. 53:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of extended testing time for the Summer 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 53:

Admitted.

REQUEST FOR ADMISSION NO. 54:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of note-takers for the Summer 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 54:

Admitted.

REQUEST FOR ADMISSION NO. 55:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of front row seating for the Summer 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 55:

Admitted.

REQUEST FOR ADMISSION NO. 56:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of the use of a tape recorder to access lectures for the Summer 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 56:

Admitted.

REQUEST FOR ADMISSION NO. 57:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors wear a Surf Link device on their person that fed directly into your hearing aid for the Summer 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 57:

Admitted.

REQUEST FOR ADMISSION NO. 58:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of live or remote captioning for the Summer 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 58:

Admitted.

REQUEST FOR ADMISSION NO. 59:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of reduced distraction testing environment for the Summer 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 59:

Admitted.

REQUEST FOR ADMISSION NO. 60:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of access to your professors/instructors PowerPoint materials for the Summer 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 60:

Admitted.

REQUEST FOR ADMISSION NO. 61:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of extended testing time for the Fall 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 61:

Admitted.

REQUEST FOR ADMISSION NO. 62:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of note-takers for the Fall 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 62:

Admitted.

REQUEST FOR ADMISSION NO. 63:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of front row seating for the Fall 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 63:

Admitted.

REQUEST FOR ADMISSION NO. 64:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of the use of a tape recorder to access lectures for the Fall 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 64:

Admitted.

REQUEST FOR ADMISSION NO. 65:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors wear a Surf Link device on their person that fed directly into your hearing aid for the Fall 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 65:

Admitted.

REQUEST FOR ADMISSION NO. 66:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of live or remote captioning for the Fall 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 66:

Admitted.

REQUEST FOR ADMISSION NO. 67:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of reduced distraction testing environment for the Fall 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 67:

Admitted.

REQUEST FOR ADMISSION NO. 68:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of access to your professors/instructors PowerPoint materials for the Fall 2015 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 68:

Admitted.

REQUEST FOR ADMISSION NO. 69:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of extended testing time for the Spring 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 69:

Admitted.

REQUEST FOR ADMISSION NO. 70:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of note-takers for the Spring 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 70:

Admitted.

REQUEST FOR ADMISSION NO. 71:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of front row seating for the Spring 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 71:

Admitted.

REQUEST FOR ADMISSION NO. 72:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of the use of a tape recorder to access lectures for the Spring 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 72:

Admitted.

REQUEST FOR ADMISSION NO. 73:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors wear a Surf Link device on their person that fed directly into your hearing aid for the Spring 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 73:

Admitted.

REQUEST FOR ADMISSION NO. 74:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of live or remote captioning for the Spring 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 74:

Admitted.

REQUEST FOR ADMISSION NO. 75:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of reduced distraction testing environment for the Spring 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 75:

Admitted.

REQUEST FOR ADMISSION NO. 76:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of access to your professors/instructors PowerPoint materials for the Spring 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 76:

Admitted.

REQUEST FOR ADMISSION NO.77:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of extended testing time for the Summer 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 77:

Denied. Plaintiff did not attend classes with defendant for the Summer 2016 semester.

REQUEST FOR ADMISSION NO. 78:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of note-takers for the Summer 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 78:

Denied. Plaintiff did not attend classes with defendant for the Summer 2016 semester.

REQUEST FOR ADMISSION NO. 79:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of front row seating for the Summer 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 79:

Denied. Plaintiff did not attend classes with defendant for the Summer 2016 semester.

REQUEST FOR ADMISSION NO. 80:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of the use of a tape recorder to access lectures for the Summer 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 80:

Denied. Plaintiff did not attend classes with defendant for the Summer 2016 semester.

REQUEST FOR ADMISSION NO. 81:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors wear a Surf Link device on their person that fed directly into your hearing aid for the Summer 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 81:

Denied. Plaintiff did not attend classes with defendant for the Summer 2016 semester.

REQUEST FOR ADMISSION NO. 82:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of live or remote captioning for the Summer 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 82:

Denied. Plaintiff did not attend classes with defendant for the Summer 2016 semester.

REQUEST FOR ADMISSION NO. 83:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of reduced distraction testing environment for the Summer 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 83:

Denied. Plaintiff did not attend classes with defendant for the Summer 2016 semester.

REQUEST FOR ADMISSION NO. 84:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of access to your professors/instructors PowerPoint materials for the Summer 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 84:

Denied. Plaintiff did not attend classes with defendant for the Summer 2016 semester.

REQUEST FOR ADMISSION NO. 85:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of extended testing time for the Fall 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 85:

Admitted.

REQUEST FOR ADMISSION NO. 86:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of note-takers for the Fall 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 86:

Admitted.

REQUEST FOR ADMISSION NO. 87:

Admit that you declined a note-taker for the Fall 2016 Physiology Lab with Ivan Moberly.

RESPONSE TO REQUEST FOR ADMISSION NO. 87:

Denied.

REQUEST FOR ADMISSION NO. 88:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of front row seating for the Fall 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 88:

Admitted.

REQUEST FOR ADMISSION NO. 89:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of the use of a tape recorder to access lectures for the Fall 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 89:

Admitted.

REQUEST FOR ADMISSION NO. 90:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors wear a Surf Link device on their person that fed directly into your hearing aid for the Fall 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 90:

Admitted.

REQUEST FOR ADMISSION NO. 91:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of live or remote captioning for the Fall 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 91:

Admitted.

REQUEST FOR ADMISSION NO. 92:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of reduced distraction testing environment for the Fall 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 92:

Admitted.

REQUEST FOR ADMISSION NO. 93:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of access to your professors/instructors PowerPoint materials for the Fall 2016 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 93:

Admitted.

REQUEST FOR ADMISSION NO. 94:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of extended testing time for the Spring 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 94:

Admitted.

REQUEST FOR ADMISSION NO. 95:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of note-takers for the Spring 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 95:

Admitted.

REQUEST FOR ADMISSION NO. 96:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of front row seating for the Spring 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 96:

Admitted.

REQUEST FOR ADMISSION NO. 97:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of the use of a tape recorder to access lectures for the Spring 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 97:

Admitted.

REQUEST FOR ADMISSION NO. 98:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors wear a Surf Link device on their person that fed directly into your hearing aid for the Spring 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 98:

Admitted.

REQUEST FOR ADMISSION NO. 99:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of live or remote captioning for the Spring 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 99:

Admitted.

REQUEST FOR ADMISSION NO. 100:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of reduced distraction testing environment for the Spring 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 100:

Admitted.

REQUEST FOR ADMISSION NO. 101:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of access to your professors/instructors PowerPoint materials for the Spring 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 101:

Admitted.

REQUEST FOR ADMISSION NO. 102:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of extended testing time for the Summer 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 102:

Admitted.

REQUEST FOR ADMISSION NO. 103:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of note-takers for the Summer 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 103:

Denied. Plaintiff did not attend courses at University of Louisiana-Lafayette for the Summer 2017 semester.

REQUEST FOR ADMISSION NO. 104:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of front row seating for the Summer 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 104:

Denied. Plaintiff did not attend courses at University of Louisiana-Lafayette for the Summer 2017 semester.

REQUEST FOR ADMISSION NO. 105:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of the use of a tape recorder to access lectures for the Summer 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 105:

Denied. Plaintiff did not attend courses at University of Louisiana-Lafayette for the Summer 2017 semester.

REQUEST FOR ADMISSION NO. 106:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors wear a Surf Link device on their person that fed directly into your hearing aid for the Summer 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 106:

Denied. Plaintiff did not attend courses at University of Louisiana-Lafayette for the Summer 2017 semester.

REQUEST FOR ADMISSION NO. 107:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of live or remote captioning for the Summer 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 107:

Denied. Plaintiff did not attend courses at University of Louisiana-Lafayette for the Summer 2017 semester.

REQUEST FOR ADMISSION NO. 108:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of reduced distraction testing environment for the Summer 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 108:

Denied. Plaintiff did not attend courses at University of Louisiana-Lafayette for the Summer 2017 semester.

REQUEST FOR ADMISSION NO. 109:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of access to your professors/instructors PowerPoint materials for the Summer 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 109:

Denied. Plaintiff did not attend courses at University of Louisiana-Lafayette for the Summer 2017 semester.

REQUEST FOR ADMISSION NO. 110:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of extended testing time for the Fall 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 110:

Admitted.

REQUEST FOR ADMISSION NO. 111:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of note-takers for the Fall 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 111:

Admitted.

REQUEST FOR ADMISSION NO. 112:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of front row seating for the Fall 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 112:

Admitted.

REQUEST FOR ADMISSION NO. 113:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of the use of a tape recorder to access lectures for the Fall 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 113:

Admitted.

REQUEST FOR ADMISSION NO. 114:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of having your professors/instructors wear a Surf Link device on their person that fed directly into your hearing aid for the Fall 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 114:

Admitted.

REQUEST FOR ADMISSION NO. 115:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of live or remote captioning for the Fall 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 115:

Admitted.

REQUEST FOR ADMISSION NO. 116:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of reduced distraction testing environment for the Fall 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 116:

Admitted.

REQUEST FOR ADMISSION NO. 117:

Admit that the University of Louisiana-Lafayette approved you for the academic accommodation of access to your professors/instructors PowerPoint materials for the Fall 2017 semester.

RESPONSE TO REQUEST FOR ADMISSION NO. 117:

Admitted.

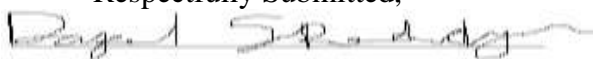
REQUEST FOR ADMISSION NO. 118:

Admit that on or about December 14, 2017, you graduated with honors at the University of Louisiana-Lafayette.

RESPONSE TO REQUEST FOR ADMISSION NO. 118:

Denied. Plaintiff's GPA was below the University Honors Program threshold.

Respectfully Submitted,



DAYAL S. REDDY, #31928

2901 Ridgelake Dr.; Suite 105

Metairie, LA 70002

Ph: (504) 383-3606

Fax: (866) 910-5978

Email: dayalsreddy@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on all counsel of record through email this 6th day of June 2018.

s/Dayal Reddy

Dayal Reddy